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November 5, 2026

Cape Cod Commission
3225 Main St.
Barnstable, MA 02630

RE: Comments on Algonquin Pipeline Relocation (CCC File No. 25012)

To Whom It May Concern:

The Association to Preserve Cape Cod (APCC) submits the following comments regarding its Development of Regional Impact (DRI) review of the proposal to modify existing interstate natural gas transmission facilities to accommodate the planned replacement of the Bourne and Sagamore Bridges by removing, abandoning, and relocating portions of existing natural gas pipelines and associated metering and regulating facilities that interact with bridge-supported and bridge-adjacent infrastructure.

Founded in 1968, APCC is the Cape Cod region's leading nonprofit environmental advocacy and education organization, working for the adoption of laws, policies and programs that protect, preserve and restore Cape Cod's natural resources. APCC focuses our efforts on the protection of groundwater, surface water, and wetland resources, preservation of open space, the promotion of responsible, planned growth and the achievement of an environmental ethic.

At the hearing on October 28, it was clear that members of the public as well as Commissioners remain unclear about the question of the proposed pipeline's potential future capacity and whether that would be consistent with the Regional Policy Plan (RPP) requirement that "regional entities must all work together to reduce greenhouse gas emissions" (p. 95, Cape Cod Regional Policy Plan 2025). Given that the Commission's regional greenhouse gas inventory determined that methane gas produces over 11% of the region's total greenhouse gas emissions (pgs. 5 and 13, Cape Cod Regional Greenhouse Gas Inventory, February 2021), any increase in gas provision to Cape Cod would seem on its face to be inconsistent with the RPP.

We understand that Algonquin has stated on the record to the Federal Energy Regulatory Commission (FERC) that the canal project will not result in new or incremental capacity and is therefore not an expansion of the Algonquin system (FERC eLibrary accession no. 20260316-5280, March 16, 2026 Algonquin response to FERC March 9 data request).

However, concern about potential for future increases in greenhouse gas emissions will persist until the project proponent provides a clear and concise statement about the capacity of the proposed pipeline as compared to the current pipelines, including the maximum physical capacity of the new pipeline, the difference between the maximum physical capacity of the existing pipeline and the new pipeline, what limits—both physical and regulatory—constrain or limit the volume of gas provided by the new pipeline, and whether the proponent intends to use any increased capacity in the future and, if so, how that additional capacity would be pursued.

APCC urges the Commission to fulfill its obligation and authority under its governing statute to ensure that these questions are answered by the applicant prior to closing the comment period. Furthermore, APCC believes that the Commission would be within its authority under the Cape Cod Commission Act to condition approval of the pipeline on capping volume of gas transmitted at the level authorized in the Certificate of Public Convenience as of the date of approval and bar future expansion of capacity beyond the Certificated level without further Commission approval. This approach will not interfere with FERC's decision or Algonquin's immediate start on construction but will retain the Commission's claim of jurisdiction to prevent future increases in emissions.

Sincerely,



Andrew Gottlieb
Executive Director